

Exhibit 31

QUADROS & ASSOCIATES, P.C.
ATTORNEYS AT LAW
2715 HUNTINGTON AVE.
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ROBERT P. QUADROS

RAYMOND B. BACON

October 26, 2009

Rex Davis, Clerk
Newport News Circuit Court
2500 Washington Avenue
Newport News, VA 23607

C
RE: Jones, Blechman, Woltz & Kelly, PC v. Nikolai I. Sinkine
Case No. CL0901007V-04
Our File No. 177594.001

O
Dear Mr. Davis:

With regard to the above matter enclosed please find an *Opposition to Motion to Intervene by Tatyana Babakaeva as a Co-Defendant* and a *Motion to Set Trial Without a Jury*, which I respectfully request you file on behalf of the plaintiff in this matter.

P
Also enclosed is a *Notice of Hearing*, which I request you file on behalf of the plaintiff to place this matter on the Court's docket for December 15, 2009 at 9:00 a.m. before the Honorable Timothy S. Fisher, Judge.

Y
I certify that I mailed a copy of this correspondence this date to defendant Nikolai I. Sinkine at his last known address of 28 Kincaid Lane, Hampton, VA 23666 and to Tatyana Babakaeva at her last known address of 2124 Criston Drive, Newport News, VA 23602. A copy of the Notice of Hearing will also be served on Nikolai I. Sinkine and Tatyana Babakaeva via the appropriate sheriff.

Thanking you in advance for your attention to this matter, I am

Very truly yours,
Quadros & Associates, P.C.

Robert P. Quadros

RPQ/sjp
Enclosures

cc: Jones, Blechman, Woltz & Kelly, PC
Nikolai I. Sinkine
Tatyana Babakaeva ✓

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Nikolai I. Sinkine,
Defendant

Case No. CL0901007V-04

OPPOSITION TO

MOTION TO INTERVENE BY TATYANA BABAKAEVA AS A CO-DEFENDANT

Comes now your Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., by counsel, and opposes the

Motion of Tatyana Babakaeva to intervene as a Co-Defendant and states as follows:

1. That the said Tatyana Babakaeva is not a party to this action, nor was a party to the contract between the Plaintiff and Defendant, nor has any say in the relationship between Plaintiff and Defendant.
2. Said Tatayana Babakaeva was represented by other counsel during the pendency of the action styled Nikolai I. Sinkine v. Tatyana A. Babakaeva.

WHEREFORE, your Plaintiff opposes any attempt by this party to intervene in this action.

Jones, Blechman, Woltz & Kelly, P.C.

By:

Of Counsel

Robert P. Quadros, VSB #14402
Raymond B. Bacon, VSB #35376
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 244-4611
#177594.001

CERTIFICATE OF SERVICE

I hereby certify that on the 20 day of October, 2009 a true and accurate copy of the foregoing Pleading was mailed to:

Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant

Tatyana Babakaeva
2124 Criston Drive
Newport News, VA 23602


Robert P. Quadros
Raymond B. Bacon
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 244-4611

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

Jones, Blechman, Woltz & Kelly, P.C.,
Plaintiff

v.

Case No. CL0901007V-04

Nikolai I. Sinkine,
Defendant

SERVE: Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666

SERVE: Tatyana Babakaeva
2124 Criston Drive
Newport News, VA 23602

NOTICE OF HEARING

PLEASE TAKE NOTICE that on December 15, 2009 at 9:00 a.m. the undersigned, by counsel, will appear at the Newport News Circuit Court, Courtroom #5, located at 2501 Huntington Avenue, Newport News, VA, before the Honorable Timothy S. Fisher, Judge, pursuant to its *Opposition to Motion to Intervene by Tatyana Babakaeva as a Co-Defendant* and its *Motion to Set Trial Without a Jury*.

PLEASE GOVERN YOURSELF ACCORDINGLY.

Jones, Blechman, Woltz & Kelly, P.C.

By:

Of Counsel

Robert P. Quadros, VSB #14402
Raymond B. Bacon, VSB #35376
Quadros & Associates, P.C.
2715 Huntington Avenue
Newport News, VA 23607
(757) 244-4611
#177594.001

CERTIFICATE OF SERVICE

I hereby certify that on the 24 day of October, 2009 a true and accurate copy of the foregoing Notice of Hearing was mailed to:

Nikolai I. Sinkine
28 Kincaid Lane
Hampton, VA 23666
Defendant

Tatyana Babakaeva
2124 Criston Drive
Newport News, VA 23602

A copy of the Notice of Hearing will also be served on Nikolai I. Sinkine and Tatyana Babakaeva by the appropriate sheriff.



Robert P. Quadros
Raymond B. Bacon
Quadros & Associates, P.C.
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Newport News, VA 23607
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